

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

GILBERTO MARTINEZ GOMEZ
LAURA MARGARITA SERRANO SANTANA

DEBTORS

CASE NO 12-03113/MCF

CHAPTER 13

**DEBTORS' REPLY TO MOTION TO DISMISS, DOCKET #73,
AND MOTION FOR EXTENSION OF TIME**

TO THE HONORABLE COURT:

COME NOW, GILBERTO MARTINEZ GOMEZ and LAURA MARGARITA SERRANO SANTANA, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. On October 18, 2013, Cooperativa de Ahorro y Credito Jesus Obrero filed a *Motion to Dismiss*, docket #73, based on the allegation that the debtors are in arrears in five (5) post-petition payments to said creditor.

2. The debtors hereby respectfully submit that they are in the process of meeting with Cooperativa de Ahorro y Credito Jesus Obrero to qualify for a loan modification. Therefore, the debtors need fourteen (14) days to inform the Court accordingly, which extension of time to expire on December 2, 2013.

WHEREFORE, the debtors request this Honorable Court grant the present motion and grant the requested extension of time, in the above captioned case.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using the CM/ECF filing systems which will send notifications of such the Chapter 13 Trustee; and also certify that I have mailed by United State Postal Service copy of this

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motion to the following non CM/ECF participants/debtors; Gilberto Martinez Gomez, Idamaris Gardens B 9 Calle Salustiana Colon, Caguas PR 00725 and Laura Margarita Serrano Santana, Hacienda San Jose 415 Via Campina, Caguas PR 00727, and to all creditors and parties in interest in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of November, 2013.

/s/ Roberto Figueroa Carrasquillo
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